

WIGGINS CHILDS  
PANTAZIS FISHER  
GOLDFARB PLLC  
Advocates & Litigators

A PROFESSIONAL LIMITED LIABILITY COMPANY  
1850 M STREET, N.W. · SUITE 720 · WASHINGTON, D.C. 20036

Direct Dial: 202-467-4489 · Fax: 205-314-0805  
Email:TFleming@wigginschilds.com · Web:www.wigginschilds.com

TIMOTHY B. FLEMING  
OF COUNSEL

August 18, 2017

The Honorable George B. Daniels  
United States District  
Judge Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1310  
New York, NY 10007

VIA ECF  
AND  
FEDERAL EXPRESS

Re: ***In Re: Terrorist Attacks on September 11, 2001, 1:03-MDL-1570 (GBD) (SN)***  
***Hoglan, et al. v. Islamic Republic of Iran, et al., 1:11-cv-7550 (GBD) (SN)***  
**Request for Extension of Time to File Objections**

Dear Judge Daniels:

On August 8, 2017, United States Magistrate Judge Sarah Netburn issued a Report and Recommendation in the above-captioned matter. (MDL ECF Doc. 3676, “*Hoglan IV*”). The *Hoglan IV* Report recommended denial of all of the *Hoglan* Plaintiffs’ remaining unresolved claims. The Report specified that any objections to the *Hoglan IV* Report would be due to be filed by August 22, 2017. The *Hoglan IV* Report and Recommendation also notes that Plaintiffs may file with the Court a request for an extension of time for filing Objections. *Hoglan IV* Report and Recommendation dated August 8, 2017, p. 24 (“Notice of Procedure for Filing Objections to this Report and Recommendation”).

Plaintiffs hereby request an extension of time to file Objections to the Magistrate Judge’s *Hoglan IV* Report and Recommendation until September 29, 2017, or until such other time as the Court deems appropriate.

The reasons for this request are as follows: (a) the need to study and consider, and consult with clients regarding, *inter alia*, the legal framework established by the *Hoglan IV* Report and Recommendation; (b) the desire of counsel to respect the Magistrate Judge’s observation regarding the limited judicial resources of the Court for consideration of extended family solatium claims, thus generating a need for appropriate re-examination of the claims in the context of the *Hoglan IV* framework, and narrowing or consolidation of issues, to the extent possible, (c) several August vacations of counsel and clients (including the unusual factor of the impending solar eclipse), and (d) the annual 9/11 commemorations (which always, in this case, make client consultations during this timeframe somewhat difficult and, for some, undesirable).

BIRMINGHAM, AL  
DELAND, FL  
NASHVILLE, TN  
WASHINGTON, D.C.

*The Honorable George B. Daniels*

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This is the first request for an extension of time in this matter. No other deadlines are affected. No defendant has appeared in this case; hence, no consultation has occurred or is required.

A proposed Order is being filed herewith.

Respectfull submitted,

A handwritten signature in dark ink, appearing to read "Timothy B. Fleming". The signature is fluid and cursive, with a large, stylized "F" at the end.

Timothy B. Fleming  
Attorney for the *Hoglan* Plaintiffs

TBF/tm

cc: All counsel of record via ECF